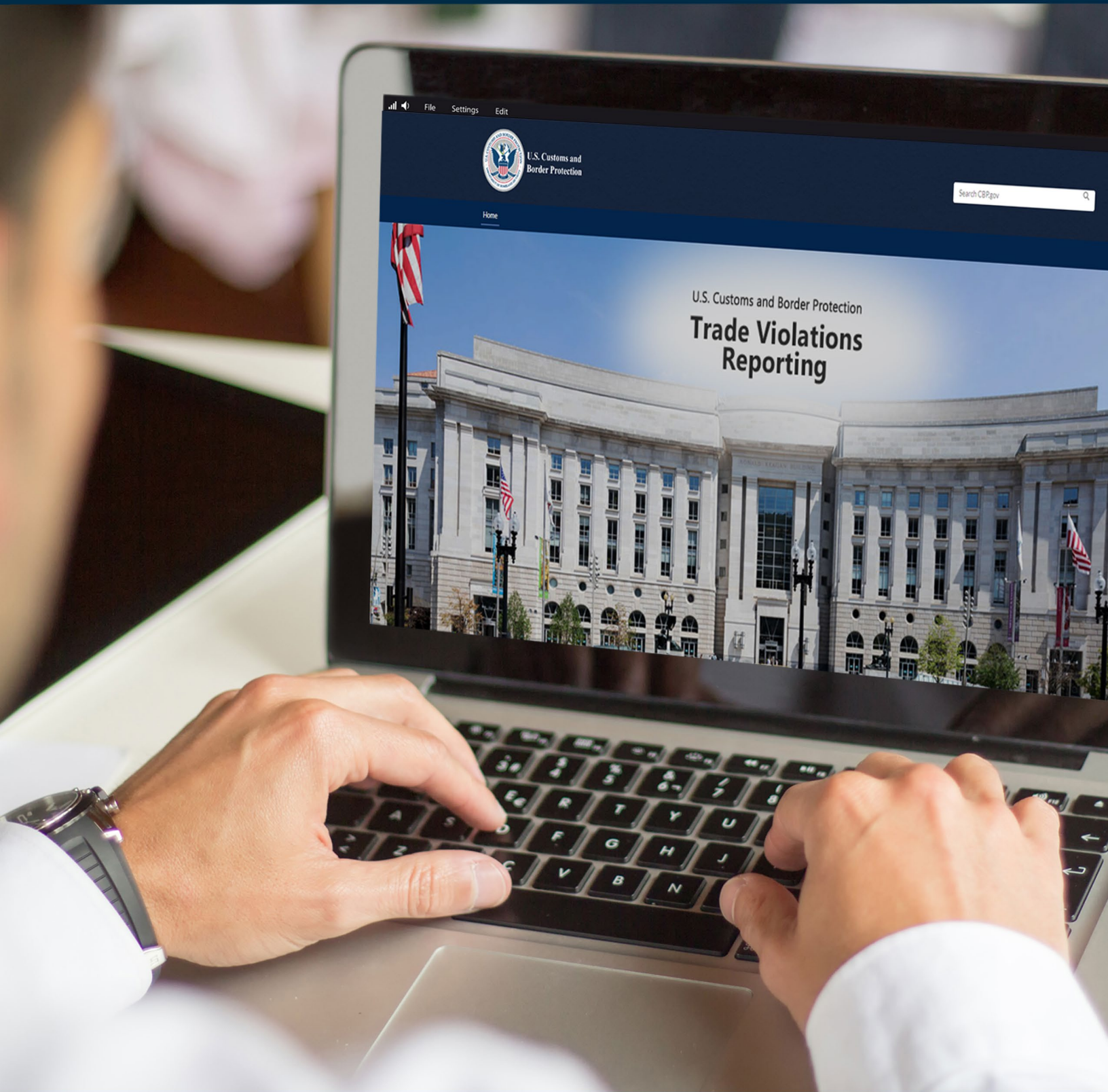


Recommended Guidelines for Submissions of **Forced Labor Supporting Documents**



U.S. Customs and
Border Protection

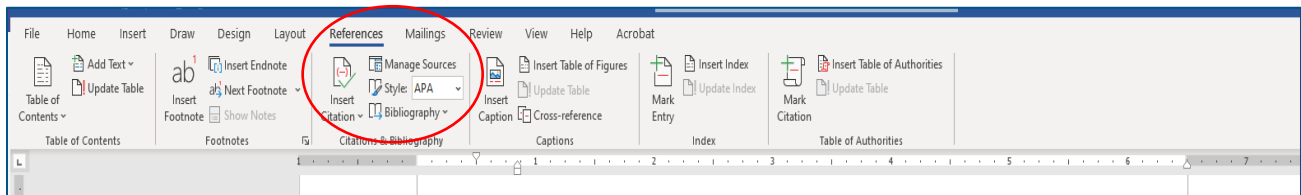




This outline provides suggested guidance on how to streamline the **supporting document submission** process for U.S. Customs and Border Protection (CBP) forced labor allegation petitions and Withhold Release Order/Finding modification requests. The goal is to provide a standardized approach for petitioners to efficiently organize their supporting documents and clearly tie them to the forced labor allegation or remediation efforts.

How to Organize Supporting Documents

1. Provide an index of supporting documents for each allegation; provide subcategories when necessary, e.g., “Worker Interviews”; “Internal Company Documents”, etc.
2. Provide references for each supporting document that is referenced in the allegation:
 - 2.1. Use notes (either footnotes or endnotes) to link the references.
 - 2.2. Use a consistent and standard citation guideline. The most common English language citation styles are the following: American Psychological Association (APA), Modern Language Association (MLA), Chicago, and Turabian.
 - 2.3. Microsoft Word allows you to insert a citation style using the “References” tab. For more information, please follow the instructions at <https://support.microsoft.com/en-us/office/add-citations-in-a-word-document-ab9322bb-a8d3-47f4-80c8-63c06779f127>.



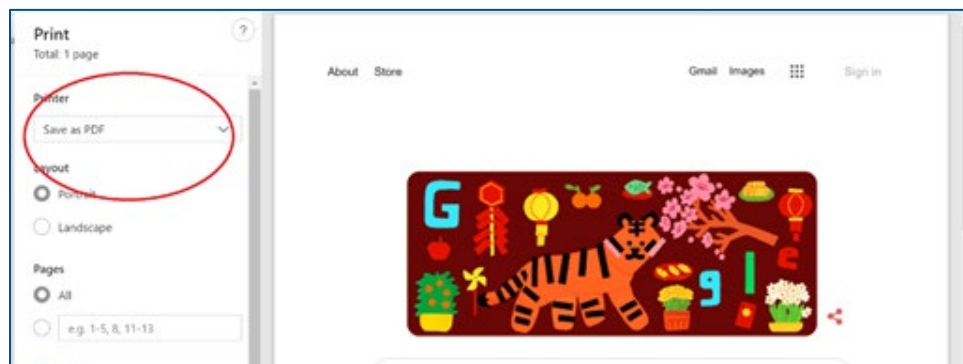
Preserving Open-source Documents

3. Provide hyperlinks with the full web address to any supporting documents obtained online.
 - Example: Google webpage link: www.google.com
4. Because the website links may expire or webpages may be taken down, all the supporting documents should be downloaded in a PDF format.
 - 4.1. How to download documents/evidence on a PDF format: Right click on the page





4.2. Click “*Print*” and make sure to select “*Save*” as PDF.



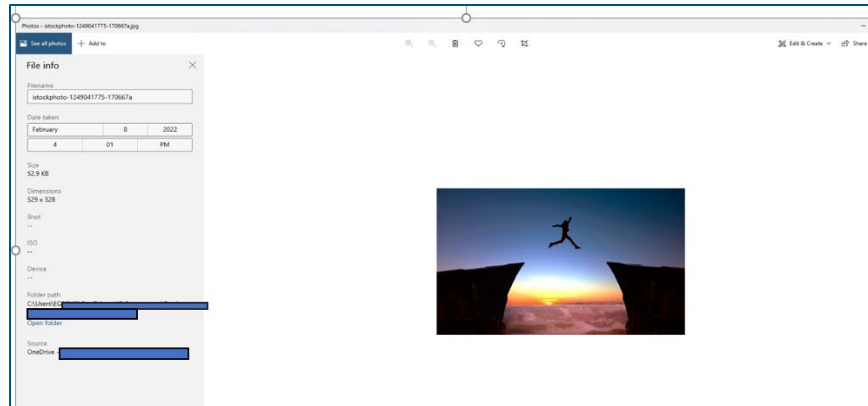
Preserving Date and Time Information

5. It is important to notate all evidence you submit with the **date it was obtained**. Add the date in the following format unless the supporting document features an automated date. The date should be reflected as follows MMDDYYYY- for instance February 1, 2022, will become 02012022. Please see picture below, as an example.



6. When submitting photos, audios, and videos, **identify** the specific photos, time stamps of audios and videos that support your allegation or modification request.
7. Provide the metadata (time, date, location) of photo, audio, and video files. You can find the information by right clicking “*Properties*” and then clicking “*File information*.”





Interview Documentation

8. Please provide interview *transcripts* when available. Transcripts provide a more word-for-word written record of the interviews with the questions and answers. Statements, which are summarized interviews, are to be avoided if possible. If only statements are available, please be sure to also provide the exact questions that were asked.
9. Methodology of how interviews were conducted and how the interview conditions were explained by the interviewer to the interviewee(s), should be clearly explained, e.g., informed consent to the interview, etc. See item 11.

Other General Documentation Submission Guidelines

10. Provide detailed context regarding how the document was obtained (Who, When, Where, and How).
11. The petitioner should be aware that CBP will endeavor to protect any Personal Identifiable Information (PII) submitted with a petition or its supporting documents. Petitions are considered part of law enforcement investigations and, therefore, receive certain protections from disclosure to outside parties. However, it is possible that the information may be subject to discovery in either a criminal case – if the case is referred to another federal agency with criminal investigation authorities – or civil case if an entity challenges CBP's enforcement action. In both scenarios, while CBP will take steps to protect PII to the greatest extent feasible during the discovery process, confidentiality treatment and/or withholding such information from disclosure is not guaranteed. Therefore, the petitioner may want to consider redacting PII prior to submission but should also be aware that PII is needed for criminal investigations by other agencies.

Personally identifiable information (PII) is any information that permits the identity of an individual to be directly or indirectly inferred, including any information which is linked or





linkable to that individual regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., etc. Examples include: name, date and place of birth, mother's maiden name, home address, vehicle license plate number.

12. Avoid modifying any supporting documents.

How to Submit Documents in Languages other than English

1. All supporting documents should be translated to English. If there is only one section that is relevant to the allegation, please mark the relevant section and provide the context of that section. In addition to the translation, the document should be included in its source language.

Example: The italicized text below is the Arabic to English translation of the text that is highlighted in yellow:

“During a meeting attended by 195 countries to finalize a grim report on climate change ramifications, the Chairman of the United Nations’ Intergovernmental Panel on Climate Change, Hoesung Lee, warned on Monday that challenges humanity is countering to combat the “Global Warming” is now greater than ever.”

حدّر رئيس الهيئة الحكومية الدولية المعنية بتغير المناخ التابعة للأمم المتحدة، هوسونغ لي، الاثنين، من أنّ التحديات التي تواجهها البشرية في مكافحة الاحترار هي اليوم «أكبر من أي وقت مضى»، وذلك خلال اجتماع شارك فيه 195 بلداً لوضع اللامسات الأخيرة على تقرير قائم عن تداعيات التغير المناخي.

وارتفعت حرارة الأرض قرابة 1,1 درجة مئوية مقارنة بعصر ما قبل الثورة الصناعية، ما أدى إلى مضاعفة موجات الحر والجفاف والعواصف والفيضانات المدمرة. وفي الجزء الأول من تقريرها الذي نشر في آب/ أغسطس الماضي، قدّرت الهيئة الحكومية الدولية المعنية بتغير المناخ أن درجة الحرارة ستصل في 2030، أي قبل عشر سنوات مما كان متوقعاً، عتبة 1,5+ درجة مئوية، الهدف الأكثر طموحاً لاتفاق باريس.

2. Translations can be obtained from [Google Translate](#). However, please **review** the translation results for accuracy and provide **notes** for cultural, social, linguistic nuances that are critical to the allegation, but may be missed by Google Translate and/or other translation methods.
3. If interviews are conducted in a language other than English, provide the following:
 - How was the interview interpreted and what are the interpreter’s qualifications?
 - What core questions were used during the interview?
 - Are the interviewee and interviewer distinguished in the transcript/summary?





4. Translate overlay texts of any photos and videos.
5. Provide transcripts of videos in the source language and translate to English.
6. Provide a PDF copy of supporting documents in source languages, in addition to the links and translations.
7. For documents containing data (such as payrolls) provide the translation of the categories as demonstrated below.

贷款分期偿还时间表									
输入值					贷款汇总				
贷款金额		\$5,000.00	预定付款			\$425.75			
年利率		4.00%	预定付款次数			12			
贷款年限		1	实际付款次数			10			
每年付款次数		12	提前付款总额			\$900.00			
贷款开始日期		4/14/2022	总利息			\$89.62			
可选额外付款		\$100.00	贷款方名称			微三			
还款编号	还款日期	期初余额	预定付款	额外还款	总付款	本金	利息	期末余额	累积利息
1	4/14/2022	\$5,000.00	\$425.75	\$100.00	\$525.75	\$509.08	\$16.67	\$4,490.92	\$16.67
2	5/14/2022	\$4,490.92	\$425.75	\$100.00	\$525.75	\$510.78	\$14.97	\$3,980.14	\$31.64
3	6/14/2022	\$3,980.14	\$425.75	\$100.00	\$525.75	\$512.48	\$13.27	\$3,467.65	\$44.90
4	7/14/2022	\$3,467.65	\$425.75	\$100.00	\$525.75	\$514.19	\$11.56	\$2,953.46	\$56.46
5	8/14/2022	\$2,953.46	\$425.75	\$100.00	\$525.75	\$515.90	\$9.84	\$2,437.56	\$66.31
6	9/14/2022	\$2,437.56	\$425.75	\$100.00	\$525.75	\$517.62	\$8.13	\$1,919.94	\$74.43
7	10/14/2022	\$1,919.94	\$425.75	\$100.00	\$525.75	\$519.35	\$6.40	\$1,400.59	\$80.83
8	11/14/2022	\$1,400.59	\$425.75	\$100.00	\$525.75	\$521.08	\$4.67	\$879.50	\$85.50

8. If the measurement units are in a language other than English, please translate the units to English, and include an explanation as to the conversion of measurement. A simple explanation between the U.S. units and the source units in English are acceptable. For example: 1 \$US = 114.67 Japanese Yen.

CBP appreciates your collaboration in following these *suggested* guidelines to make the review process as efficient as possible. Any additional steps you can take to provide clarity in the information submitted will facilitate more expedient reviews.

